

# **EXHIBIT “A”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:13-cv-00721-FL**

<b>MARIAN SNOW,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>DECLARATION OF DEANNA L.</b>
<b>v.</b>	)	<b>SGRO IN SUPPORT OF GLOBAL</b>
	)	<b>CREDIT AND COLLECTION</b>
<b>GLOBAL CREDIT AND COLLECTION</b>	)	<b>CORPORATION'S MOTION TO SET</b>
<b>CORPORATION; and GLOBAL</b>	)	<b>ASIDE ENTRY OF DEFAULT</b>
<b>INTERNATIONAL,</b>	)	
	)	
<b>Defendants.</b>	)	

COMES NOW, Deanna L. Sgro, pursuant to 28 U.S.C. § 1746, and declares under penalty of perjury as follows:

1. My name is Deanna L. Sgro. I am over the age of twenty-one (21) and am competent to testify to the matters contained herein. I have personal knowledge of all the facts set forth in this declaration.

2. I am General Counsel to Global Credit and Collection Corporation ("Global") and am responsible for the coordination of the response of Global to complaints that are filed in federal and state court against Global throughout the United States.

3. Global has established procedures to obtain service of process in the State of North Carolina. Global has designated CT Corporation System to act as its registered agent within the state.

4. Due to an apparent breakdown in communication, Global did not receive service of the Complaint filed by Plaintiff Marian Snow (the "Plaintiff") against Global in *Marian Snow v. Global Credit and Collection Corporation et. al*, in the United States District Court for the Eastern District of North Carolina, Case No. 5:13-cv-00721-FL (hereinafter the "Lawsuit").

5. In fact, Global did not even learn of the existence of the Lawsuit until Wednesday, May 7, 2014, when I was forwarded via regular mail certain documents that Plaintiff had attempted to serve on Global's co-defendant, Global International.

6. Immediately after receiving these documents, on Thursday, May 8, 2014, I notified Global's retained outside counsel to represent Global in the Lawsuit.

7. Global has conducted an internal investigation of Plaintiff's claims. Despite this investigation, Global has been unable to locate any record of Plaintiff ever having an account with Global, of Global ever attempting to collect a debt owed by Plaintiff, or of Global ever contacting or attempting to contact Plaintiff or any of the third-parties alleged in Plaintiff's Complaint.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 21, 2014.

  
DEANNA L. SGRO